



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 22 2012

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Steven E. McCorry
Manager, EH&S
PPG Industries, Inc.
559 Pittsburgh Road
Circleville, Ohio 48686

Re: Finding of Violation
PPG Industries, Inc., Circleville, Ohio

Dear Mr. McCorry:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to PPG Industries, Inc. (PPG or you). We find that you are violating Section 113(a) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a), at your Circleville, Ohio facility.

We have several enforcement options under Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Constantinos Loukeris. You may call him at (312) 353-6198 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



George T. Czerniak
Acting Director
Air and Radiation Division

Enclosure:

cc: Eric Yates, OEPA

4. The MON applies to each miscellaneous organic chemical manufacturing affected source, which is the facility-wide collection of miscellaneous organic chemical manufacturing process units (MCPUs) and heat exchange systems, wastewater, and waste management units that are associated with manufacturing materials described in 40 C.F.R. § 63.2435(b)(1). (*See* 40 C.F.R. § 63.2440).

5. The MON applies to owners or operators of MCPUs that are located at, or are part of, a major source of HAP emissions as defined in Section 112(a) of the Act, 42 U.S.C. § 7412(a). (See 40 C.F.R. § 63.2435(a)).

6. The MON, at 40 C.F.R. § 63.2435(b), states that an MCPU includes equipment necessary to operate a miscellaneous organic chemical manufacturing process, as defined in 40 C.F.R. § 63.2550, that satisfies the following conditions: a) produces an organic chemical classified using the 1987 version of Standard Industrial Classification (SIC) code 282, 283, 284, 285, 286, 287, 289, or 386; an organic chemical classified using the 1997 version of North American Industry Classification System (NAICS) code 325; quaternary ammonium compounds and ammonium sulfate produced with caprolactam; hydrazine; or organic solvents classified in any of the SIC or NAICS previously listed that are recovered using non-dedicated solvent recovery operations; b) processes, uses, or generates any of the organic HAPs listed in Section 112(b) of the Act or hydrogen halide and halogen HAP, as defined in 40 C.F.R. § 63.2550; and c) is not an affected source or part of an affected source under another subpart in Part 63, except for process vents from batch operations within a chemical manufacturing process unit, as identified in 40 C.F.R. § 63.100(j)(4). The MON, at 40 C.F.R. § 63.2435(b), also states that the MCPU includes any assigned storage tanks and transfer racks; equipment in open systems that is used to convey or store water having the same concentration and flow characteristics as wastewater; and components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems that are used to manufacture any material or family of materials described above.

7. The MON, at 40 C.F.R. § 63.2460(a) states that subject sources must meet each emission limit in Table 2. Table 2 of the MON states that for each process with Group 1 batch process vents, subject sources must reduce collective uncontrolled organic HAP emissions from the sum of all batch process vents within the process by greater than or equal to 98 percent by weight by venting emissions from a sufficient number of the vents through one or more closed-vent systems to any combination of control devices.

8. The MON, at 40 C.F.R. § 63.2460(c)(2)(ii), requires that when subject sources conduct a performance test or design evaluation for a non-flare control device used to control emissions from batch process vents, the source must establish emission profiles and conduct the test under worst-case conditions according to 40 C.F.R. § 63.1257(b)(8) instead of under normal operating conditions as specified in 40 C.F.R. § 63.7(e)(1).

9. As stated in 40 C.F.R. § 63.1257(b)(8), testing of emissions on equipment where the flow of gaseous emissions is intermittent (batch operations) shall be conducted as specified in paragraphs (b)(8)(i) through (iii) of this section, which requires testing at "absolute worst-case conditions or hypothetical worst-case conditions." Under 40 C.F.R. § 63.1257(b)(8)(iii), performance testing requires three runs, at a minimum of 1 hour each and a maximum of 8 hours each.

10. The MON, at 40 C.F.R. § 63.1257(b)(8)(ii), requires that the emission profile shall be developed based on any one of the procedures described in (b)(8)(ii)(A) through (C). If a company selects the emissions profile by process approach under 40 C.F.R.

§ 63.1257(b)(8)(ii)(A), the emission profile must consider all emission episodes that could contribute to the vent stack for a period of time that is sufficient to include all processes venting to the stack and shall consider production scheduling. The profile shall describe the HAP load to the device that equals the highest sum-of emissions from the episodes that can vent to the control device in any given hour. Emissions per episode shall be calculated using the procedures specified in 40 C.F.R. § 63.1257(d)(2). Emissions per episode shall be divided by the duration of the episode only if the duration of the episode is longer than 1 hour.

11. The MON, at 40 C.F.R. § 63.2480(a), states that the owner or operator of an affected source must meet each requirement in Table 6 to Subpart FFFF that applies to its equipment leaks, except as specified in paragraphs (b) through (d) of this section.

12. The MON, at 40 C.F.R. § 63.2550(i), defines “in organic HAP service” as a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP as determined according to the provisions of 40 C.F.R. § 63.180(d).

13. The MON, at 40 C.F.R. § 63.2550(i), defines “Group 1 transfer rack” as a transfer rack that loads more than 0.65 million liters/year of liquids that contain organic HAP with a rack-weighted average partial pressure, as defined in 40 C.F.R. § 63.111, greater than or equal to 1.5 pound per square inch absolute.

14. Table 6 to the MON states that for all equipment that is in organic HAP service, the owner or operator of an affected source must either comply with the requirements of Subpart UU or Subpart H of Part 63 and the requirements referenced therein, except as specified in 40 C.F.R. § 63.2480(b) and (d), or comply with the requirements of Subpart F of Part 65 and the requirements referenced therein, except as specified in 40 C.F.R. § 63.2480(c) and (d).

15. Table 12 of the MON requires compliance with 40 C.F.R. § 63.6(e)(1). 40 C.F.R. § 63.6(e)(1) states that at all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions to at least levels required by all relevant standards.

16. Subpart UU, at 40 C.F.R. § 63.1033(b)(1), requires each open-ended valve or line to be equipped with a cap, blind flange, plug, or second valve.

17. Subpart UU, at 40 C.F.R. § 63.1025(b)(1), requires that the valves be monitored to detect leaks by the method specified in 40 C.F.R. § 63.1023(b).

18. Subpart UU, at 40 C.F.R. § 63.1026(b)(1), requires that the pumps be monitored monthly to detect leaks by the method specified in 40 C.F.R. § 63.1023(b).

19. Subpart UU, at 40 C.F.R. § 63.1023(b), states that instrument monitoring, as required under Subpart UU, shall comply with the requirements specified in paragraphs (b)(1) through (b)(6) of this section.

20. Subpart UU, at 40 C.F.R. § 63.1023(b)(1), requires monitoring to comply with Method 21, except as otherwise provided in this section.

21. Method 21, at 40 C.F.R. Part 60, Appendix A, Section 8.3.1, requires the owner or operator of an affected source to slowly sample the interface of a component where leakage is indicated until the maximum meter reading is obtained.

22. Subpart UU, at 40 C.F.R. § 63.1032(b), requires each sampling connection system to be equipped with a closed-purge, closed-loop, or closed vent system.

23. The MON, at 40 C.F.R. § 63.2460(a), requires that the source meet each emission limit in Table 2 to Subpart FFFF that applies to the batch process vents, and that the source meet each applicable requirement specified in paragraphs (b) and (c) of this section.

24. Table 2 of the MON requires for each process with a Group 1 process vent that the source reduce collective uncontrolled organic HAP emissions from the sum of all batch process vents within the process by ≥ 98 percent by weight by venting emissions from a sufficient number of the vents through one or more closed-vent systems to any combination of control devices (except a flare).

25. The MON, at 40 C.F.R. § 63.2475(a), requires that the source comply with each emission limit and work practice standard in Table 5 to Subpart FFFF that applies to the transfer racks, and that the source must meet each applicable requirement in paragraphs (b) and (c) of this section.

26. Table 5 of the MON requires for each Group 1 transfer rack that the source reduce emissions of total organic HAP by ≥ 98 percent by weight or to an outlet concentration ≤ 20 ppmv as organic HAP or TOC by venting emissions through a closed-vent system to any combination of control devices (except a flare).

27. The MON, at 40 C.F.R. § 63.2485(a), states that the source must meet each requirement in Table 7 to Subpart FFFF that applies to the wastewater streams and liquid streams in open systems within a MCPU, except as specified in paragraphs (b) through (o) of this section.

28. Table 7 of the MON requires each process wastewater stream to comply with the requirements in 40 C.F.R. §§ 63.132 through 63.148 and the requirements referenced therein, except as specified in 40 C.F.R. § 63.2485.

29. 40 C.F.R. § 63.110(e)(2)(i) states that for each Group 1 and Group 2 wastewater stream, the owner and operator shall comply with the more stringent control requirements and the more stringent testing, monitoring, recordkeeping, and reporting requirements that overlap between the provisions of this subpart and the provisions of 40 C.F.R. parts 260 through 272. The owner or operator shall keep a record of the information used to determine which requirements were the most stringent.

30. 40 C.F.R. § 63.132(a)(1) requires an owner or operator to determine whether each wastewater stream requires control for Table 9 compounds by complying with the requirements in either paragraph (a)(1)(i) or (a)(1)(ii) of this section, and comply with the requirements in paragraph (a)(1)(iii) of this section.

31. 40 C.F.R. § 63.132(c) provides instructions for determining whether a wastewater stream is Group 1 or Group 2 for Table 9 compounds. This section states, "Total annual average concentration shall be determined according to the procedures specified in 40 C.F.R. § 63.144(b) of this subpart. Annual average flow rate shall be determined according to the procedures specified in 40 C.F.R. § 63.144(c) of this subpart."

32. 40 C.F.R. § 63.144(b) requires an owner or operator that elects to comply with paragraph (a)(1) of this section by measuring the concentration for the relevant Table 9 compounds, to determine the annual average concentration for each wastewater stream, either at the point of determination, or downstream of the point of determination with adjustment for concentration changes made according to paragraph (b)(6) of this section. 40 C.F.R. § 63.144(b)(5) requires a minimum of three samples from each wastewater stream, which may be grab samples or composite samples.

Factual Background

33. PPG owns and operates a resin and paint manufacturing plant at 559 Pittsburgh Road, Circleville, Ohio (Plant), which is a major source of HAPs, as defined in 40 C.F.R. § 63.2 of Subpart A.

34. PPG owns or operates MCPUs, as defined at 40 C.F.R. § 63.2435(b), in the resin manufacturing process at the Plant, which are subject to the requirements of 40 C.F.R. Part 63, Subpart FFFF and by reference Subpart UU and Subpart GGG. The process vents, storage vessels, transfer operations, and wastewater at the Plant are also subject to the requirements at 40 C.F.R. Part 63, Subpart G.

35. From May 18, 2010 through May 20, 2010, EPA conducted a Clean Air Act investigation of the Plant hereafter referred to as "May 2010 Inspection."

36. During the May 2010 Inspection, EPA discovered four open-ended lines or valves associated with the following process equipment and nearest leak detection and repair (LDAR) tag number:

- a. K6 Glycol Weigh Tank (Tag# 10219)
- b. K10 Reactor (Tag#11364)
- c. K6 Reactor (Tag#11600)
- d. B/T 169 (Tag# 14937)

37. During the May 2010 Inspection, PPG provided a copy of the LDAR contractor's monitoring sheets that indicated the number of components monitored by technicians for the period of May 17, 2010 through May 19, 2010.

38. The table below summarizes the number of components monitored by each LDAR technician for May 17, 2010 through May 19, 2010 taking into account a 30 minute instrument calibration period into the hours billed:

Technician ID	May 17, 2010	Hours Billed	May 18, 2010	Hours Billed	May 19, 2010	Hours Billed	Average Component per Hour**
480	801	9.5	422	10	-	10	89*
325	869	9.5	824	10	865	10	91.3
298	796	9.5	779	10	913	10	88.9

* This average was calculated using data for May 17, 2010 only. This senior technician was conducting LDAR monitoring on May 17, 2010 but was involved in other activities on May 18 and May 19, 2010.

**The 30-minute calibration period was subtracted out per technician in determining the average components monitored per technician per hour.

39. During the May 2010 Inspection, PPG's contractor stated that it uses the following protocols and practices during LDAR monitoring of PPG's facilities:

- a. 20-30 minutes to calibrate the instruments to be used to perform EPA Reference Method 21 for the day;
- b. Check in with PPG operators to determine if critical batch is in place to avoid interrupting operations;
- c. Notify PPG environmental staff that they will be present on-site to conduct periodic monitoring; and
- d. Conduct EPA Reference Method 21.

40. From April 26, 2011 through April 28, 2011, EPA conducted a Clean Air Act investigation of the Plant, hereinafter referred to as "April 2011 Inspection."

41. During the April 2011 Inspection, PPG provided EPA with MON semi-annual compliance reports, performance tests, and wastewater records for review.

42. After the April 2011 Inspection, PPG provided additional information to EPA in a letter dated June 10, 2011.

43. In the June 10, 2011 letter, PPG provided time sheets for the monitoring performed by each LDAR technician including the monitoring results.

44. EPA analyzed the data provided by PPG and prepared the table below regarding the LDAR monitoring performed by PPG's technicians:

Monitoring Date	Components Monitored	Technician ID	Total Hours Billed	Average Components Monitored per Hour per Technician*
8/21/2008	1746	295/298	20	91.9
8/22/2008	1751	295/298	20	92.2
8/23/2008	1961	295/298	20	103.2
8/24/2008	1498	295/298	20	78.8

11/19/2008	953	402	4	272.3
11/20/2008	1474	402	10	155.2
11/21/2008	1286	402	10	135.4
11/22/2008	1676	402	10	176.4
11/23/2008	1233	402	8.5	154.1
11/24/2008	313	402	4	89.4
2/23/2009	1867	402	10	196.5
2/24/2009	2249	402	10	236.7
2/25/2009	1622	402	10	170.7
2/26/2009	1172	402	10	123.4
5/19/2009	2741	480/260/572	30	92.9
5/20/2009	2638	480/260/572	30	89.4
5/21/2009	1551	480/260/572	24	66.0
8/25/2009	2419	480/257/325	24	102.9
8/26/2009	2544	480/257/325	24	108.3
8/27/2009	1951	480/257/325	24	83.0
12/7/2009	2279	480/257/325	24	101.3
12/8/2009	2327	480/257/325	24	103.4
12/9/2009	2303	480/257/325	24	102.4
2/9/2010	2305	480/298/325	27	90.4
2/10/2010	2357	480/298/325	27	92.4
2/11/2010	2241	480/298/325	24	99.6

*Note: The 30-minute calibration period was subtracted out per technician in determining the average components monitored per technician per hour.

45. On September 3, 2008, PPG's contractor, Environmental Quality Management, Inc. (EQM), conducted stack testing of the regenerative thermal oxidizer (RTO).

46. In a report dated September 2008, EQM set forth the results from the performance testing of the RTO. According to Table 2-1 of the September 2008 report, the first two runs were 50 minutes each and the third run was 1 hour and 32 minutes.

47. PPG's September 2008 RTO performance test report provided a general process description of what process equipment and storage tanks operated with various process activities that may have occurred, and referred to this as the Plant's emissions profile.

48. Based on the September 2008 RTO performance test report, PPG set the daily minimum average temperature operating limit at 1,554.4°F for the RTO.

49. PPG operates a Group 1 transfer rack as part of the Building 2 operations at the Circleville Plant.

50. The September 2008 RTO performance test report did not identify the Group 1 transfer rack located in Building 2 as part of the emissions profile. The September 2008 report did not include the calculations required by 40 C.F.R. § 63.1257(d)(2) as part of the emissions

profile. During the April 2011 Inspection and in its letter dated June 10, 2011, PPG confirmed that the Group 1 transfer rack located in Building 2 was not included in the emissions profile and was not in operation during the September 2008 performance test of the RTO.

51. On or about May 13, 2008, PPG's contractor, EQM, conducted a performance test on the Thermal Oxidizer Unit (TOU) that is used to control HAP emissions from Building 1 and its associated tank farm and transfer rack. In a report dated June 2008, EQM set forth the results from the May 2008 performance test.

52. In the June 2008 TOU performance test report, PPG provided a general process description of what process equipment and storage tanks operated with a specific reference to PPG's Title V emission unit numbers, and referred to this as its emissions profile. The June 2008 TOU performance test report did not include the calculations required by 40 C.F.R. § 63.1257(d)(2) as part of the emissions profile.

53. Based on the May 2008 TOU performance test results, PPG set the daily minimum average temperature operating limit at 1,258.4°F for the TOU.

54. During the April 2011 inspection, PPG provided EPA with a MON wastewater record indicating the points of determination with the associated annual average concentrations.

55. During the process overview in the April 2011 Inspection, PPG stated that there is a vapor liquid separator upstream of the RTO and the TOU, individually. Material from this stream is sent to the on-site hazardous waste combustor. Material from this stream was not identified on PPG's MON wastewater record as a point of determination.

56. During the plant tour in the April 2011 Inspection, EPA identified a sampling connection system that collected sample purges in a 55-gallon drum that had an opening to the atmosphere located at the bottom of the C-Line reactor.

57. During EPA's review of PPG's semi-annual compliance reports (dated February 27, 2009, July 31, 2009, February 26, 2010, August 30, 2010, and February 24, 2011), EPA identified a cause of deviation that diverted emissions away from the RTO and the TOU to the atmosphere on multiple dates and times for the period of May 2008 through December 2010. The cause of deviation is, "Control header inlet diversion due to elevated LEL (Lower Explosive Limit) safety interlock." The table below summarizes the number of diversions over the number of days in a calendar year along with the duration for the specified period of time.

	Number of Diversions (Exceedance Events)	Number of Days Impacted (days)	Total Duration for Period (Hours)
RTO -- 2008	76	35	20.7
RTO - 2009	124	82	48.5

RTO – 2010	68	48	38.85
TOU – 2008	66	51	34.8
TOU - 2009	24	21	35.5
TOU – 2010	87	61	109.85

58. In PPG's semi-annual compliance reports dated February 27, 2009, August 30, 2010, and February 24, 2011, PPG identified the following periods where the daily average temperature was below the daily minimum average temperature operating limit for the RTO and/or the TOU:

- a. July 6, 2008, TOU, 24 hours, Daily Average Temperature – 1,230°F
- b. July 7, 2008, TOU, 24 hours, Daily Average Temperature – 1,249°F
- c. November 29, 2008, RTO, 24 hours, Daily Average Temperature – 909°F
- d. January 9, 2010, RTO, 24 hours, Daily Average Temperature – 1,458°F
- e. February 5, 2010, RTO, 24 hours, Daily Average Temperature – 1,551°F
- f. August 15, 2010, TOU, 24 hours, Daily Average Temperature – 1,200°F
- g. August 16, 2010, TOU, 24 hours, Daily Average Temperature – 1,243°F

Violations

59. Based on the May 2010 Inspection, PPG failed to equip four open-ended lines with either a cap, blind flange, plug, or second valve, in violation of 40 C.F.R. § 63.2480(a) and by reference 40 C.F.R. § 63.1033(b)(1) and (3).

60. In May 2008, PPG conducted a performance test on the TOU, which controls HAP emissions regulated under the MON, without establishing an emissions profile to demonstrate testing under worst-case conditions. The general description provided by PPG in the performance test report does not consider all emission episodes that could contribute to the vent stack or describe the HAP load to the device that equals the highest sum of emissions from the episodes that can vent to the control device in any given hour. The performance test report failed to include calculations regarding emissions per episode using the procedures specified in 40 C.F.R. § 63.1257(d)(2). PPG failed to conduct a valid performance test of the TOU in violation of 40 C.F.R. §§ 63.2460(c)(2)(ii), 63.1257(b)(8), and 63.1257(b)(8)(ii)(A).

61. In September 2008, PPG conducted a performance test on the RTO, which controls HAP emissions regulated under the MON, without establishing an emissions profile to demonstrate testing under worst-case conditions. The general description provided by PPG in the performance test report does not consider all emission episodes that could contribute to the vent stack or describe the HAP load to the device that equals the highest sum of emissions from the episodes that can vent to the control device in any given hour. The performance test report did not include the calculations for emissions per episode using the procedures specified in 40 C.F.R. § 63.1257(d)(2). PPG failed to conduct a valid performance test on the RTO in violation of 40 C.F.R. §§ 63.2460(c)(2)(ii), 63.1257(b)(8), and 63.1257(b)(8)(ii)(A).

62. In September 2008, PPG conducted a performance test on the RTO with three test runs; however, the test report noted only 50 minutes for two of the three test runs. PPG failed to conduct a valid performance test in violation of 40 C.F.R. §§ 63.2460(c)(2)(ii) and 63.1257(b)(8)(iii), which requires three test runs, at a minimum of one hour each.

63. Based on the information provided during the April 2011 Inspection and PPG's June 10, 2011 letter, EPA determined that PPG did not operate the Group 1 transfer rack that is a part of Building 2 and vents to the RTO during the September 2008 performance test. PPG failed to demonstrate a ≥ 98 percent by weight of total organic HAP for a Group 1 transfer rack in violation of 40 C.F.R. § 63.2475(a) and Table 5 of the MON.

64. The excessive number of components that PPG reported to have been monitored per technician per day, as described in paragraphs 38 and 44 above, reflects improper monitoring procedures. PPG failed to perform EPA Reference Method 21 properly on valves and pumps in violation of 40 C.F.R. §§ 63.2480(a), 63.1025(b)(1), 63.1026(b)(1), Table 6 and EPA Reference Method 21 (Section 8.3.1).

65. Based on the April 2011 Inspection, EPA determined that the sample purges collected are not in a closed purge system for the sampling connection system located at the bottom of the C-Line reactor. PPG failed to equip the bottoms of the C-Line reactor sampling connection system with a closed purge system in violation of 40 C.F.R. § 63.2480(a), Table 6, and 63.1032(b).

66. Based on the review of PPG's semi-annual compliance reports and the summary provided in paragraph 57, PPG diverted HAP emissions to the atmosphere and away from the RTO and TOU during the times noted in paragraph 57. PPG failed to demonstrate a reduction of HAP emissions by ≥ 98 percent by weight of total organic HAP in violation of 40 C.F.R. § 63.2460(a) during the time periods set forth in paragraph 57. During the time periods in paragraph 57, PPG did not operate and maintain the affected sources in a manner consistent with good air pollution control practices. By diverting HAP emissions to the atmosphere and away from the RTO and TOU, PPG failed to control HAP emissions for the Group 1 batch process vents in violation of 40 C.F.R. §§ 63.2460(a), 63.6(e)(1), 63.6(e)(3)(i)(A), Table 2, and Table 12.

67. Based on the review of PPG's semi-annual compliance reports for the MON and the specific dates listed in paragraph 58, PPG did not control HAP emissions from the RTO and TOU to the levels required for Group 1 batch process vents. By operating the RTO and the TOU at daily average temperatures below the required parametric monitoring setpoint from the performance tests, PPG failed to control HAP emissions for the Group 1 batch process vents in violation of 40 C.F.R. § 63.2460(a) and Table 2.

68. Based on the information provided during the April 2011 Inspection, EPA determined that PPG did not identify every point of determination for wastewater. PPG failed to identify the vapor liquid separators upstream of the RTO and the TOU as a point of determination and to determine whether the wastewater therein is Group 1 or Group 2 for Table 9 compounds in violation of 40 C.F.R. § 63.2485(a) and by reference 40 C.F.R. §§ 63.110(e)(2)(i), 63.132(a) and 63.144(b). PPG failed to keep a record of the information used to determine which of the overlapping requirements contained in the MON and RCRA provisions applicable to the waste from the vapor liquid separators were more stringent in violation of 40 C.F.R. § 63.110(e)(2)(i).

Date

8/21/12


George T. Czerniak
Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Finding of Violation, No. EPA-5-12-OH-12, by Certified Mail, Return Receipt Requested, to:

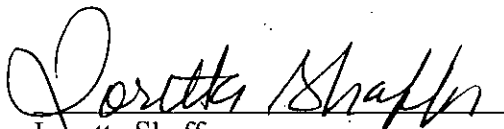
Steven E. McCorry
Manager, EH&S
PPG Industries, Inc.
559 Pittsburgh Road

I also certify that I sent copies of the Finding of Violation by first-class mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
Columbus, Ohio 43215

Adam Ward, Air Pollution Control Supervisor
Central District Office
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
Columbus, Ohio 43215

On the 22 day of August 2012.


Loretta Shaffer
Administrative Program Assistant
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7667 5987